



# Storm Water Permitting Documents

Do You Need Them  
and  
Tools for Successful Implementation

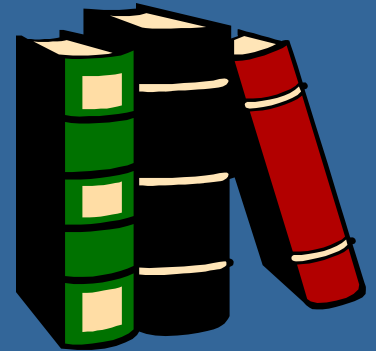
Thomas Lacki, CHMM, and Katherine  
Terry



# Topics of Discussion

- Definitions
- Regulatory Requirements
- Universal Program Elements
- Best Management Practices
- Program Implementation

# Definitions

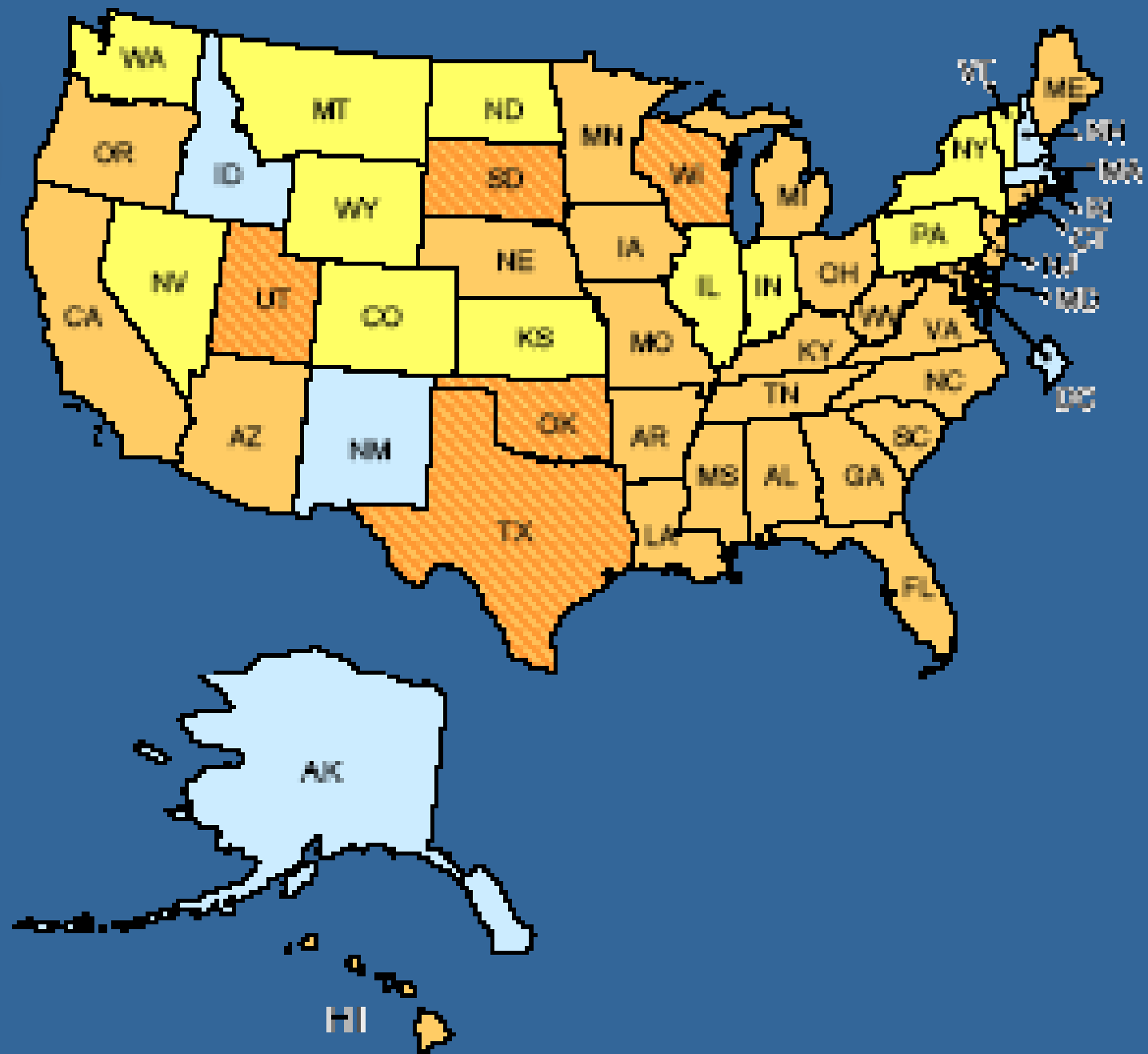


- Storm Water
  - Surface runoff resulting from precipitation
- Pollutant
  - Natural or man made addition to waters
- Pollutant Discharge
  - Any addition of pollutants into navigable waters from any point source



# Regulatory Requirements

- 40 CFR Part 122
  - Prohibits point source discharges of storm water associated with industrial activity to a waters of the U.S. without a permit
  - Based primarily in SIC code
- Federal program often controlled by each state





# Regulatory Requirements

- Do you need a permit?
  - Depends on location and operations
- Individual vs. General Permit
  - Based on operations
  - Based on SIC code
  - Requirements vary from sector to sector and state to state

# Regulatory Requirements

- Permit documentation
  - Permit Application (NOI or other)
  - Storm Water Management Plan (SWPPP, etc.)
    - Facility inspection reports
    - Storm water inspection reports
    - Storm water sampling data
    - Discharge monitoring reports (if applicable)
    - Training documentation
    - BMP procedures



# Universal Program Elements

- **Good housekeeping**
- **Preventive maintenance**
- **Visual inspections**
- **Material handling and spill prevention**
- Erosion control
- Runoff management
- Training







# Universal Program Elements

- Housekeeping
  - All areas that may contribute pollutants to storm water discharges shall be maintained in a clean, orderly manner.
    - Vehicle/Equipment storage and cleaning areas
    - Fueling areas
    - Material storage areas



# Universal Program Elements

- Preventive Maintenance
  - Timely inspections and maintenance of all storm water management devices
  - Inspection and maintenance of facility equipment



# Universal Program Elements

- Visual Inspections
  - Visually inspect facility
    - All appropriate areas for signs of pollutants impacting storm water discharge.
    - Frequency permit dependent
  - Visually inspect storm water discharge
    - At each outfall
    - Usually once per quarter



# Universal Program Elements

- Material Handling
  - Procedures to prevent or minimize the potential for discharge of materials to storm water during storage or transfer operations.
    - Solids or liquids
- Spill Prevention
  - Facility Spill Prevention Plan
    - SPCC, SPCR, etc.





# Best Management Practices (BMPs)

- Where YOU can make a difference
  - Housekeeping
  - Preventive Maintenance
  - Equipment Washing
  - Fueling/Bulk Transfer
  - Material Handling
  - AST management

# BMPs

- Housekeeping
  - Police outside areas daily
  - Sweep outside areas on a scheduled basis
  - Dry sweep all spills or releases immediately upon discovery
  - Immediately report any signs of spills or releases
  - Document or log all housekeeping activities

# BMPs

- Preventive Maintenance
  - Inventory equipment which if malfunctions could impact storm water
  - Establish inspection and maintenance schedules for all appropriate equipment
  - Repair or replace defective equipment within 48 hours
  - Drain oil filters before disposal or recycle
  - Document all maintenance activities

# BMPs

- Equipment/Vehicle Washing
  - Clean equipment inside when possible
  - Use an offsite car wash if available
  - Use mild, phosphate-free detergents
  - If outside
    - Designate specific cleaning areas
    - Provide containment systems
    - Provide tarps or absorbent materials to minimize discharge



# BMPs

- Fueling/Bulk Transfer
  - Provide spill/overflow protection (drip pans)
  - Develop procedures to minimize overfill
    - Double check hose connections
    - No top off
    - Transfer must be observed at all times
  - Use dry cleanup methods
  - Seal off storm drains during transfer
  - Ensure all hoses are properly disconnected

# BMPs

- Material Handling
  - Develop standard loading/unloading procedures
  - Use designated loading/unloading areas
  - Use drip pans or other spill containment
  - Clean all spills immediately upon completion
  - Transfer materials inside or under cover when possible

# BMPs

- AST Storage
  - Comply with Spill Prevention/Response Plan
  - Upgrade ASTs with overflow alarms
  - Routinely inspect all ASTs and containment structures
  - Install secondary containment



# Program Implementation

- Description of Potential Pollutant Sources
- BMP Management and Control
- Storm Water Monitoring
- Facility Inspection
- Recordkeeping and Reporting